

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLINT ROBERT SCHRAM

Defendant.

Case No. 5:20-cr-06002-DGK

NOTICE OF GOVERNMENT’S PROFFER FOR SENTENCING

The United States of America, by and through its counsel, and F.A. White, Jr., counsel for defendant Clint Robert Schram, agree that Special Agents of the FBI, if called to testify at the defendant’s sentencing hearing, would testify as follows:

I. The Defendant Plotted Online to Kidnap, Rape, and Murder a Child

Information Obtained from Foreign Law Enforcement Regarding the Defendant

1. In or around September 2019, the FBI was contacted by an agent of a foreign law enforcement agency (“FLA”). This FLA agent was operating undercover on “Website A,” which was a website dedicated to child pornography and the discussion of child sexual abuse, and which was created and administered by the defendant. The FLA agent told FBI that he had been contacted by two separate users of Website A (“User-1” and “User-2”), who reported to him that the defendant, using a particular username on Website A and other online platforms, had made plans with another individual online (“User-3”) to kidnap, rape, enslave, and murder a specific 8-year-old girl living in the United States (the “Intended Minor Victim”).

2. User-1 was previously a high-ranking staff member of Website A. He was later arrested in a foreign country. As the defendant put it, User-1 was arrested after he “went off to go meetup with a pedomom to fuck her children...” The FLA agent provided the FBI with chat transcripts between him and User-1 in which User-1 made the following statements (spelling and syntax in original throughout this document, unless otherwise indicated):

- a. “we have a big problem with [the defendant]”
- b. “He is behaving completely irradically stupid”
- c. “He is planning to obduct a 8yo girl together with some guy he has met in [Website C]...”
- d. “he told me he has made a special chat just for the two of them...”
- e. “They have located their target, he will keep her in his apartment, lots of dirty stuff. I honestly was too shocked to consider all of the details”
- f. “I have a feeling they have been getting each other worked up with the idea”
- g. “for now he says they are going to go through with the plan next year”
- h. “[the defendant] has sent pictures to me & [User-2]”
- i. User-2 thinks “that this is a real threat”
- j. “I honestly think this is as bad as it gets”
- k. “he want to keep her until she is 18-20... How well did that go for Fritzel???”¹

¹ Joseph Fritzl is an Austrian national who imprisoned his daughter in his home for twenty-four years. During this time, he continuously raped and abused her and treated her as a sexual slave. She bore at least seven of his children before she managed to escape and contact law enforcement. Fritzl was later sentenced to life imprisonment in Austria.

- l. The defendant “mentioned something about the parents having lots of kids, ‘one won’t be missed...’”
- m. User-1 copied and pasted statements that the defendant had made to him, including the following:
 - i. “I will keep my dark fantasies to myself from now on”
 - ii. The defendant also stated that another user was “mad a t me I told her about my nefarious plance and she got sick and leave chat”
- n. User-1 further stated that “I deleted [the pictures of the Intended Minor Victim] again, they honestly made me feel sick”
- o. “I deleted the files, and the download link is gone”

3. User-1 gave the FLA agent online contact information for User-2, and the FLA agent engaged User-2 about the defendant’s plans. User-2 was also a high-ranking staff member of Website A who was later arrested in a foreign country. The FLA agent also provided the FBI with chat transcripts between him and User-2 in which User-2 made the following statements:

- a. “i understood you are shocked and worried too like all of us, all who know”
- b. User-2 provided the FLA agent with the following copied-and-pasted statements that the defendant made directly to User-2:
 - i. “Where I think a small town in the central USA like kansas would be good”
 - ii. “I am even start a pedo rental business”
 - iii. “BUT I am USA I will hunt in my back yard not overseas”

- iv. “This plan is for spring/summer 2020 so you have time to talk me out of it”
- v. “my little fuck toy,” “I am going to own me a fuck toy”
- vi. “I am middle aged man I want a fuck toy and I want to produce CP with her”²
- vii. “This is my new toy I just have to go snatch her. They live isolated in the country no houses around ... there is another sister 12 but I do not know if I can manage to keep 2 captives?”
- viii. “My dick is hard just thinking about her :) fuck I am going to own my very own loli!!!”³
- ix. In response to User-2 asking the defendant about whether he will go through with this kidnapping plan, the defendant told User-2 “YES but now I am pissed and will murder her” and “I will make a famous vid called [Intended Minor Victim’s] Destruction!”⁴

4. User-2 provided the FLA agent with a link to photos that he received from the defendant, and which depicted the Intended Minor Victim. Most of these photos depicted the Intended Minor Victim playing outdoors while fully clothed. One photo consisted of a close-up depiction of her asleep in a bed. She is positioned on her side with a blanket pulled up to her armpits, apparently not wearing a shirt, and with her arm, upper back, and head uncovered. The Intended Minor Victim is visibly underage and prepubescent in these photos.

² “CP” is short for “child pornography.”

³ “Loli” is short for “Lolita,” which commonly refers to underage girls.

⁴ This statement appears to be a reference to “Daisy’s Destruction,” which is an infamous child sexual abuse video depicting the prolonged and deliberate sexual torture of a female toddler.

5. The conversation between User-2 and the FLA agent continued, during which User-2 made the following statements:

- a. “apparently someone he knows, knows her” [referring to the Intended Minor Victim], “another pedo,” “presumably he took the pics”
- b. “now [the defendant] is claiming it’s all fantasy,” “I’m not so sure”
- c. “I told him it’s a fucking bad idea and it will end with him dead or in jail and a kid damaged for life.” In response, the defendant told User-2 that “he didn’t think he would be caught.”
- d. “I am chatting with [the defendant] now,” “he is saying it’s all fantasy and has always been fantasy,” “it sure didn’t look like fantasy to me when he told me”
- e. Yet another pedophile on Website A believed the defendant intended to carry out his plan.
- f. The defendant “is not a RP person at all,”⁵ “I had absolutely no reason to assume this was not a real plan”
- g. “well he sounds pretty convincing about it being all fantasy now,” “still, I think it wouldn’t hurt for [law enforcement] to locate this girl and carefully investigate every guy who knows her family”
- h. “none of us want to see a real innocent girl suffer this, what he has mentioned”

⁵ “RP” refers to “role playing,” generally involving the graphic online fantasies involving the sexual abuse of children.

- i. “i am still talking with him...,” “he’s constantly switching between this is real vs fantasy”
- j. User-2 copied and pasted more messages that the defendant sent directly to him. After User-2 says “i am just totally not following now if this is real or just fantasy,” the defendant made the following statements:
 - i. “she is cute and I will have her”
 - ii. “YES, me and the kid [User-3] are making plans to take that girl and I WANT HER”
 - iii. “This is all kiddy sport no rape or molesting happens here FUCK lewave me alone”
 - iv. “OK happy now the plan is real I hope I get here before you guys get the cops involved”
 - v. “I am a bad man a very very bad man YES I AM GOING TO KIDNAP THAT GIRL AND KEEP HER AS A SEX SLAVE”
 - vi. “You guys can call the FBI if you want to I don’t care, me and the kid [User-3] are kidnapping that girl I WANT HER I AM IN LOVE WITH HER ALLREADY”
 - vii. “Yes the girl IS REAL and the PALN is REAL OK is that waht you want to hear?”
 - viii. Look the 16 year old kid [User-3] is going to rape that girl with or without me”

- ix. “God Damn this is all just an illusion this is not evil this is Disney land park no children here were raped and molested in these pictures”
- x. “I am evil ok I fantasise about having a kid in a rape dugeon for my fucking selfish please excuse the fuck out of me”
- xi. “There not plans there fantasy”
- k. User-2 continued chatting with the FLA agent and noted that the defendant is “constantly going from ‘fantasy’ to ‘real’”
- l. “if he thinks saying ‘oh it was just fantasy’ is going to make everything and everyone go back to normal, I’m afraid he’s wrong”
- m. “the ‘targets’ are this 7/8 yr old one and her 11/12 yr old sister”
- n. User-2 suggested that they may want to contact law enforcement, “unless we have unequivocal confirmation and clear statements that this is FANTASY,” “I am still not sure,” “maybe it IS fantasy”
- o. “I also don’t want to rat him out over fantasies,” “heck you should know how many hot girls I see every day and fantasize about doing all sorts of sick stuff with them (cons and non-cons),” “I’d never do anything non-cons, ever”
- p. “there’s a difference between fantasy and acting,” “i’ve done myself, lots, but only consnsual”
- q. “I know girls who have been raped or abused for real,” “I know the effects it has on them,” “the lifelong trauma it causes,” “I would never cause that to happen to any girl for real, I couldn’t live with myself if I did that”

FBI's Identification of the Intended Minor Victim and User-3

6. After receiving this information from the FLA agent, FBI agents identified the Intended Minor Victim living in the American northeast. FBI agents interviewed her family and determined that User-3 was a juvenile living in the Western District of Virginia who was close friends with the Intended Minor Victim's family and had slept over at their house. In October 2019, FBI agents executed a search warrant at User-3's home and interviewed him. During this interview, User-3 stated the following:

- a. He took the photos of the Intended Minor Victim described above.
- b. He was involved with a website related to "freedom of speech," on which people discussed murder and "anything you wouldn't normally talk about." He later identified this website as Website C, which the defendant created and administered. He eventually became an administrator of Website C.
- c. User-3 met the defendant on Website C. The two began talking about hurting someone, and User-3 shared photos of the Intended Minor Victim with the defendant. The defendant began asking questions about the girl and eventually proposed the idea of kidnapping her. According to User-3, the defendant planned to carry out the kidnapping in one year. User-3 also described the defendant as "big into child porn, that was pretty much all he talked about."
- d. User-3 claimed that he had no intention of hurting the Intended Minor Victim and had never touched her inappropriately.

7. During the search warrant at User-3's home, agents recovered hand-written notes that had been torn up and left in a trash can. The notes included the following (some of the notes were scribbled out, as noted below):

~~Hello. Is very simple. Drive to home, park car in this long hard to see driveway that's near the girls home. They have long driveway that cant be see from house and neighbors so we park up on a weekday and wait for bus to drop off. I will walk up and choke from behind and bring to car. If~~

~~Hello. I have 3 plans. There are 2~~

Hello. I have 3 plans. First, information. Location: very small quiet town. House on a dead end road. They are in the near end of the dead end road. Long driveway, plus trees around meaning no one can see driveway (not even from the house)

Family: Mother, Father, 15yr old son, 12-13 year old girl, 10 or 11 yr old boy, 8 year old girl

Where to grab: when waiting for bus (little one only), dropped off (), going up to friends house on street

Targets: At least young girl, hopefully both girls

In case of disease: Attempt our best cure I don't expect them to get disease, if the do we shall cure

[New page]

them ourselves or if worse comes to worse they die.

Body disposal: feed to pigs, acid burn everything gone, drop in deep lake/ocean, bury. Bury is risky, animal may find. Ocean/lake may get explored and accidentally found. Acid will completely dissolve to nothing. Pigs eat everything and destroy bones.

Mental turmoil: I am thoroughly skilled at manipulation, calming others, making them accept what has happened and breaking people down to slaves

In case of interference: shoot, knife, beat unconscious. Options: take away and kill and dispose the interfeerer, or leave dead. Any witnesses must be killed.

Setup: On the dead end you will be fully masked and hidden. I'll begin the kidnap. You will be with me if there's 2 or more. If 1 I shall do it, walkie-talkie you to come pick me up and leave. After we out of town, unmask to prevent suspicion. I will make her unconscious and tie up in car. If 2 we will both choke one each. As said I will engage

[New page]

OK here's my latest info: Meeting gas will waste so much money. I got a lowkey spot if we do decide but it'll waste your cash where it could be used for the mega trip.

Money: we got around 6 weeks for the best chance. Make 10\$ an hour, 8 hours a day, 5 days a week for 5 weeks. That's 2000 dollars. The trip will cost around 600 gas, add food and other I'd say 200-800.

Why 6 weeks? I go up and most likely sleep over, easiest way.

Money 2: we should rob the parents and kids cash they got.

Plan 1: Aggressive

Info: Don't get to sleep over, but am up there. Any trouble = death

- ~~1.) its 1am~~
- ~~2.) we tie up everyone at gun point~~
- ~~3.) leave with girl, 10-12-14 hours to get away~~
- 1.) You pick me up
- 2.) we go to the house at 1am
- 3.) we Quietly break in
- 4.) we tie everyone at gun point and leave with girl

[New page]

Plan 2: Passive

Info: sneaky, trouble = death

- 1.) I sleep over
- 2.) I drugged kid
- 3.) I sneak her out to truck; taped mouth
- 4.) we leave

Plan 3: Aggressive

Info: trouble = death

- 1.) I sleep over
- 2.) I drug kid
- 3.) radio you to come in
- 4.) gunpoint tie up
- 5.) leave with girl

Plan 4: Aggressive

Info: if we miss October day we use this. trouble = death

- 1.) As soon as you are prepared You come to me and pick me up
- 2.) we get from my location to the targets
- 3.) quietly invade
- 4.) tie up at gun point
- 5.) leave

All of this, me, you, her go with you to your home. Now, how will you support me?

8. FBI agents reviewed User-3's phone and determined that he had at one point spent at least an hour in the Intended Minor Victim's bedroom while she was sleeping. During this time, he filmed her sleeping and at one point pulled her sheets down slightly.

9. User-3 was arrested in October 2019. He was eventually convicted of possession of child pornography and sentenced to 15 years in prison.

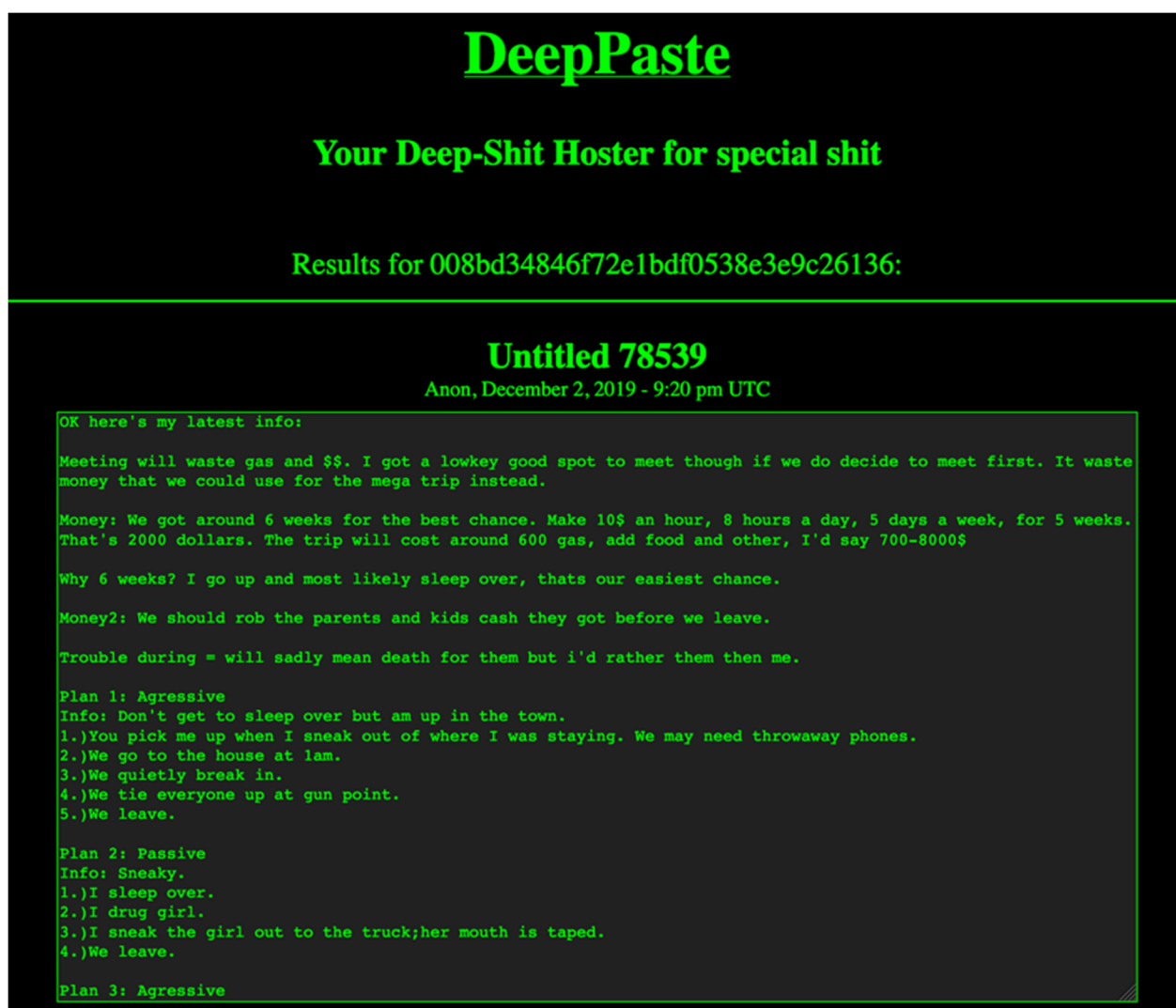
Additional Information About the Kidnapping Plot Obtained by FBI

10. In approximately January 2020, an undercover FBI agent chatted with another child pornography offender online ("User-4"). User-4 was likewise a staff member of Website A. User-4 was never identified or arrested and the FBI believes he is still active on multiple dark web child pornography websites. During these chats, User-4 made the following statements:

- a. "I'm a bit worried about [the defendant]"
- b. "there is troubling information about him"
- c. "In mid-September he told several people about wanting to kidnap a young girl. he told at least me and [another Website A user, 'User-5']. he says he also told [User-1]."
- d. "he claimed he had a partner with some dude he met in chat. they were planning on meeting. he shared detailed plans with me."
- e. "here is the deeppaste he shared with me. it is the plan. he said he got this from his partner." [Link to "DeepPaste" page.]
- f. "When I pointed out the absolute stupidity of it he backed off. he came back and said the plan fell through..."

11. The undercover FBI agent accessed the DeepPaste link shared by User-4. DeepPaste is a dark web website where users can write notes that can be saved for later access.

The DeepPaste page in question contained a plan that is strikingly similar to some of the notes found in User-3's trash can. Some of the statements were slightly different. For example, the DeepPaste page states "Trouble during = will sadly mean death for them but i'd rather them then me." The DeepPaste page also contains more detailed logistical information about how to enter the home and how to handle certain eventualities that might arise. The page is dated December 2019, which was after the arrest of User-3. The information on the page is reproduced below:



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After a while I can get a lowkey job, we'll talk about that then, when done. After the heat cools, I will
obviously be leaving and find another place to hideout and live and come visit and film with you like we
wouldve been doing. How's this sound?

Extra info:
Ways to silently break in:
Pry Window Open
Remove doornob
Smash glass, tape
Break tiny glass on door, reach in, unlock

ISSUES:
*When glass is broken, after shes taken, if its loud, theyll get there before it logically makes sense that
you grabbed her so fast.. we'll have to make it as silent as possible.
*Noise: Solve, break in after you broke in (still as quiet as possible), its unlikely that they hear a small
crack, they upstairs and door closed.
*Door squeak: lol its a risk we gotta take, the back door will be quieter. That's the plan. No problem.
*Stairs creak: Risk we gotta take, their door is closed, ill make sure everythings good and give you the call
to enter.
*locked door: ill unlock
*kid wakes up: drugged
*buzzer: walk around lul, park back, lights off, middle of the long ass driveway.
*yells:tape up mouth when you take, shes drugged so wont wake, or slow reaction, only noise will need to be
muted, shes petite and weak.
*they wake up as you leave, or when you enter: if leaving just run, you'll have a headstart, theyll be
confused and ill radio it. If they hear the noise of entry and wake up (SUPER UNLIKELY-VERY-SUPER DUPER
UNLIKELY), ill radio you to abort, easy as that.
*anything known that may interrupt: ill radio to await or abort..
*checks for phone calls and other communication for evidence: solution, walkie talkies, quiet, non traceable

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The Defendant's Statements About the Plot and Murdering User-3

12. As set forth in Paragraph 69 of the Presentence Report, the FBI also discovered a folder on the defendant's desktop in which he discusses the arrest of User-2 and refers to the kidnapping plot. In this document he refers to murdering User-3 to cover his tracks, as follows:

And also just fyi you take the whole [User-1] arrest way took seriously, he fucked up he broke protocall, he broke the rules of engagement. He went off to go meetup with a pedomom to fuck her children, does that sound like a smart idea to you? Doing a home invasion at 3am locked and loaded with high powered weaponry snatching and grabbing a kid and then murdering any witnesses such as [User-3] much better chance of sucess. I only hesitate for 1 reason, one of my parents is still alive, rather old but still alive...

The Defendant's Explanation of the Kidnapping Plot During his Interview

13. In July 2020, the FBI executed at search warrant at the defendant's home and arrested him. Agents discovered multiple firearms at the defendant's home, including at least one magazine-fed AR-15-style rifle.

14. During an interview with the defendant, the interviewing agent asked the defendant about the kidnapping plot. In order to increase the likelihood that the defendant would

admit to his conduct regarding his plans with User-3 (as opposed to denying everything), the interviewer acted as if he was willing to believe that the defendant did not intend to go through with the kidnapping. At the time of the interview, however, the FBI—including the interviewing agent—believed that the defendant truly intended to go through with the kidnapping, and the FBI and interviewing agent believe this to this day.

15. The interviewer stated “you at least plotted—whether its fantasy or not—to kidnap, rape, and murder an eight year old girl. Now I assume that’s fantasy? ... Now I want to believe you that that was all just talking shit but that’s why we got to get through all of this to make sure you’re not a kidnapper, right?” The defendant agreed, parroted the interviewer’s themes back to him, and claimed that he was “just going along with the kid”—*i.e.*, User-3—and “that was the kid scheming.” Later on, the defendant stated that “I never had any intentions of kidnapping that girl. I actually felt that that kid was real and the girl was real” but what User-3 did, “I had no part of it.” The defendant claimed that the DeepPaste document was something that User-3 sent to him. The agent sated “I’m willing to believe you that you didn’t really intend to physically kidnap a girl and keep her in your basement,” to which the defendant ultimately replied, “I wouldn’t have had the gas money to drive up there.” In response, the agent stated “I don’t want that to be the reason. The reason I hope is that you didn’t actually want to hurt a child. ... Not just that you didn’t have gas money.” The defendant again parroted the agent and said “I don’t ever want to hurt a child.” He later said that the kidnapping “wasn’t real” for him, but “I think it was real for the kid.” After being shown a picture of the Intended Minor Victim the defendant stated that User-3 “really was gonna rape her.” The defendant also described User-3 as “pretty disturbed” and a “pretty lost, lost kid,” and that he “wasn’t quite right.”

16. FBI forensic examiners discovered a folder on the defendant's computer with the file path "/Pictures/CP/girls/[Intended Minor Victim] kidnap." This folder contained 34 images of the Intended Minor Victim, including the images described above. Two more images were found that appeared to be cropped from one of the photographs from the collection. Additionally, the forensic examiners located multiple documents that related to the defendant's plan to abduct, rape, and murder the Intended Minor Victim in the same folder. These documents outline the plans using the same or similar language as described above. For instance, one document saved in file path "/Pictures/CP/girls/[Intended Minor Victim] kidnap/Plans.txt." includes a 17-step "plan." The plan includes sleeping over in the home, drugging the kids (including the Intended Minor Victim), taping the mouth of the Intended Minor Victim, and carrying her to a waiting car where she would be tied up. The final step of the plan is simply, "cha ching! we win."

II. The Defendant Plotted to Kill R.B, His Family, and Others

17. In April 2020, before the defendant's arrest, the FBI obtained information from two of the defendant's Gmail accounts. This information included emails, stored documents, and search activity. It included the following:

- a. In January 2019, the defendant searched for information about how to commit murder and get away with it. He visited pages with titles "The Only Murdering Murder Guide You'll Ever Need, You Murderer," "5 Reasons People Get Away With Murder," and "16 Steps to Kill Someone and Not Get Caught." Around the same time as these searches, the defendant repeatedly searched for R.B. and his wife in Kansas City, Missouri.

- b. In April 2019, the defendant searched for information on homemade napalm, pressure cookers, pressure cooker bombs, death row in Missouri, death row inmates, and the death penalty.
- c. In May 2019, the defendant searched for information pertaining to first degree murder in Missouri, pressure cooker bombs, black powder bombs, and napalm. He also researched whether someone could be convicted of murder without a body.
- d. In October 2019, shortly after the FBI learned of his plot with User-3 as described above, the defendant searched online for the penalty for rape.

18. During his interview in July 2020, the defendant stated that he previously worked with R.B., and he was fired for threatening R.B. The defendant stated outright that he wanted to kill R.B. and his family: "I really want to murder him and I actually, I know this probably sounds really bad but murdering him doesn't really accomplish much. There's no pain in that. Killing his family. That, there's pain in that. He has to live with that for the rest of his life. I was kind of wanting to murder his whole family." The defendant further stated that "I didn't do it and I don't think it would. I more and more coming to accept what happened but yeah, I really wanted the motherfucker. I really wanted more to kill his family." He further stated that he did not intend to kill anyone, but that R.B. "really ruined my life. I really, he's pretty lucky he ain't killed I'll say that." The defendant shared his specific plans for killing R.B., stating "he pretty close to have gotten killed. You want to know why, my next big plan was? ... I was gonna try to make a pressure cooker bomb. They have a union meeting once a month at the union hall. ... I was going to throw a pressure cooker." After the interviewing agent asked whether there would

be others at the union meeting other than R.B., the defendant stated “Yeah, casualties, what do you call that? Collateral damage?”

19. Following the defendant’s arrest, R.B. was interviewed at his place of employment concerning his relationship with the defendant. When R.B. learned the FBI was at his place of employment and wished to speak with him, R.B. ran into the conference room where the interviewing agent was waiting. The interviewing agent observed that R.B. was visibly upset and attempting to hold back tears. R.B. loudly asked the interviewing agent repeatedly if his family was alright. R.B. advised he was terrified the defendant had hurt or killed someone in his family. R.B. advised the defendant’s behavior became increasingly erratic over the summer of 2017 after the defendant lost a religious accommodation with his and R.B.’s shared employer. The defendant was committed at a mental health facility on four separate occasions and at a drug and alcohol rehabilitation center once. During the defendant’s third committal at a mental health facility, the defendant threatened to burn R.B.’s house down while his children were inside. During the defendant’s fourth committal, his therapist called R.B. and told him the defendant had threatened to kill R.B. and bomb his place of employment. During the summer and fall of 2017, the defendant sent R.B. numerous threatening text messages. In one of the messages, the defendant told R.B. he was going to rape R.B.’s daughters and “fill them full of his dick cheese.” At the time, R.B.’s daughters were 13 and 18 years old. The defendant told R.B. he was going to masturbate to photographs of R.B.’s daughters that the defendant had located on Facebook. The defendant also mailed hateful letters to R.B.’s home in which the defendant threatened to kill R.B. and his family. When R.B.’s oldest daughter began attending college, the defendant sent R.B. the address and apartment number where she lived. Several times during the interview, R.B. advised he was very concerned for his safety and the safety of his family. R.B. indicated he

and his wife had moved during the time the defendant was threatening them, in part because they were concerned the defendant knew their address. R.B. also bought several guns and taught his daughters how to shoot them. R.B. subsequently sought a protection order against the defendant, which was granted.

III. The Defendant Also Threatened R.M. Online

20. A review of the defendant's Gmail accounts also revealed multiple threatening messages to R.M., a pastor at a religious institution in Kansas City, Missouri. One message, sent in April 2019, referred to the defendant setting R.M. on fire and meeting him in hell. In another message, sent in January 2020, the defendant told R.M. that he hoped he died a violent death and that his family was raped and murdered by "baseball bat sized nigger dicks."

IV. The Defendant Claimed to Have Committed Murder and Rape in the Past

23. In April 2022, while detained in Bates County, Missouri, the defendant entered the following information into a terminal in the detention center:

i, clint r schram, raped and murdered a young girl in the very late 1980's in the state of oragan

cat recall name of town, but remember very vividly the area where i dumped her body. i also raped a pre teen in sikeston mo late 80's as well. it was GOOD!! :)

* * *

Undersigned counsel respectfully request that the Court accept this proffer in lieu of live testimony presented during the sentencing hearing.

Respectfully submitted,

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Chief, Child Exploitation and Obscenity Section
U.S. Department of Justice, Criminal Division

By: /s/ Kyle Reynolds

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on November 2, 2023, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Kyle Reynolds

Kyle P. Reynolds
Trial Attorney
U.S. Department of Justice, Criminal Division